

DISTRICT ATTORNEY KINGS COUNTY

350 JAY STREET BROOKLYN, NY 11201-2908 (718) 250-2000 WWW.BROOKLYNDA.ORG

> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [#######]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: SHAQUANNA WHITE

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move <u>in limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

MOS WHITE ENTERED A PLEA OF GUILTY TO THE FOLLOWING DEPARTMENT CHARGES AND SPECIFICATIONS ARISING OUT OF AN INCIDENT ON OR ABOUT 03/24/2009:

- MOS WHITE, WHILE ASSIGNED TO THE TRANSIT BUREAU AND OFF DUTY, IN THE SCHOOLYARD OUTSIDE
 OF A PUBLIC SCHOOL IN JAMAICA, NEW YORK, WRONGFULLY SAID, IN SUBSTANCE, TO A NINE (9) YEAR
 OLD GIRL, IDENTITY KNOWN TO THE DEPARTMENT, "IF YOU TOUCH MY DAUGHTER AGAIN, I WILL PUT MY
 HANDS ON YOU."
- MOS WHITE, WHILE ASSIGNED TO THE TRANSIT BUREAU AND OFF DUTY, IN THE SCHOOLYARD OUTSIDE
 OF A PUBLIC SCHOOL IN JAMAICA, NEW YORK, WRONGFULLY DISPLAYED TO A NINE (9) YEAR OLD GIRL,
 IDENTITY KNOWN TO THE DEPARTMENT, A FIREARM, BY LIFTING UP HER SHIRT AND PULLING SAID
 FIREARM PARTIALLY OUT OF HER WAISTBAND.
- 3. MOS WHITE, WHILE ASSIGNED TO THE TRANSIT BUREAU AND OFF DUTY, IN THE SCHOOLYARD OUTSIDE OF A PUBLIC SCHOOL IN JAMAICA, NEW YORK, HAVING DISPLAYED A FIREARM TO A NINE (9) YEAR OLD GIRL, IDENTITY KNOWN TO THE DEPARTMENT, WRONGFULLY SAID, IN SUBSTANCE, TO SAID GIRL, "I BET YOUR MOM DON'T HAVE ONE OF THESE. YOUR MOM COULD BRING ANYONE TO SCHOOL BECAUSE I'M NOT AFRAID OF ANYONE. SHE COULD BRING ANYTHING SHE WANTS. ANYBODY. TELL YOUR MOM TO COME TO THE SCHOOL, AFTER SCHOOL AND WE COULD DISCUSS THIS FURTHER."

CASE STATUS: CLOSED ON 12/11/2012

PENALTY: FORFEITURE OF THIRTY (30) VACATION DAYS AND DISMISSAL PROBATION TWELVE (12) MONTHS.

Disclosure # 2:

THE FOLLOWING ALLEGATIONS, DATED 12/07/2010, ARE PENDING AGAINST MOS WHITE:

NOTE: NO RECORD FOUND - NYPD WAS UNABLE TO PROVIDE A STATUS UPDATE ON UPON SPECIFIC REQUEST.

Disclosure # 3: ON MAY 18, 2013, MOS WHITE, KINGS COUNTY DOCKET NUMBER THE LAST TWO STATEMENTS WERE FALSE. THE SERGEANT SUBSEQUENTLY INFORMED AN ASSISTANT DISTRICT ATTORNEY THAT HE HAD NEVER TOLD MOS WHITE THAT HE HAD TRAINING IN IDENTIFYING ALL THESE SUBSTANCES, NOR HAD HE TOLD MOS WHITE

THE SERGEANT SUBSEQUENTLY INFORMED AN ASSISTANT DISTRICT ATTORNEY THAT HE HAD NEVER TOLD MOS WHITE THAT HE HAD TRAINING IN IDENTIFYING ALL THESE SUBSTANCES, NOR HAD HE TOLD MOS WHITE THAT HE HAD DETERMINED THAT THE SUBSTANCES RECOVERED FROM THE BACKPACK INCLUDED LSD, ADDERALL, AND LISDEXAMFETAMINE. MOS WHITE, HERSELF, ALSO INFORMED THE ASSISTANT DISTRICT ATTORNEY THAT, CONTRARY TO THE STATEMENTS THAT SHE HAD PREVIOUSLY MADERALL, AND LISDEXAMFETAMINE AND HAD NOT TOLD HER THAT HE HAD TRAINING IN IDENTIFYING LSD, ADDERALL, AND LISDEXAMFETAMINE AND HAD NOT TOLD HER THAT HE HAD DETERMINED THAT NATURE OF THE SUBSTANCES RECOVERED FROM THE BACKPACK BASED ON ANY SUCH TRAINING. RATHER, SHE HAD ASSUMED THAT THE SERGEANT HAD SUCH TRAINING. MOS WHITE ALSO STATED THAT SHE KNEW THE NATURE OF THESE SUBSTANCES BECAUSE THE DEFENDANT HIMSELF HAD IDENTIFIED THEM.

Disclosure # 4:

MOS WHITE WAS ADJUDICATED GUILTY OF THE FOLLOWING DEPARTMENT CHARGES AND SPECIFICATIONS ARISING OUT OF AN INCIDENT ON OR ABOUT 06/02/2014:

1. MOS WHITE WHILE ASSIGNED TO THE TB DT30 AND ON DUTY AT A LOCATION KNOWN TO THE DEPARTMENT, ABUSED HER AUTHORITY AS A MEMBER OF THE NEW YORK CITY POLICE DEPARTMENT, IN THAT SHE CONDUCTED IN A STRIP SEARCH OF AN INDIVIDUAL KNOWN TO THE DEPARTMENT WITHOUT SUFFICIENT LEGAL AUTHORITY.

CASE STATUS: CLOSED ON 6/27/2016

PENALTY: FORFEITURE OF TEN (10) VACATION DAYS.

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:

Disclosure # 5:

CCRB CASE: 201405432 REPORT DATE: 06/03/2014 INCIDENT DATE: 06/02/2014 CCRB SUBSTANTIATED ALLEGATION:

1. Abuse - Strip-searched

NYPD Disposition: APU: Guilty, Penalty of APU: Forfeit vacation 10 days

Eric Gonzalez District Attorney Kings County